# This announcement was distributed to the EIS community on 2/13/2012. There was one error (EOM pollutant code) that is corrected here in red font.

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# This is to announce several pollutant code changes for the 2011 NEI reporting cycle.

**SUMMARY:**

**We are retiring the following pollutants:**

141 (benzene soluble organics),
142 (methylene chloride soluble organics),
626 (Dioxins/Furans as 2,3,7,8-TCDD TEQs -I/89)
627 Dioxins/Furans as 2,3,7,8-TCDD TEQs - WHO/98
600 Dioxins/Furans as 2,3,7,8-TCDD TEQs - TEQ scheme unspecified

**We are un-retiring the following pollutants:**

140 (coke oven emissions) this pollutant replaces 141 and 142 and is to be used only for emissions from coke ovens.
284 (extractable organic matter) this pollutant will allow the upcoming compliance test data for several NESHAP to be used to quantify emissions

**We are adding the following pollutants:**

628 (Dioxins/Furans as 2,3,7,8-TCDD TEQs - WHO2005) --- the WHO2005 toxicity equivalency factors replace earlier schemes and users should either report dioxin/furan emissions using the updated factors or report individual dioxin/furan congeners.

**You will not be able to report new emissions for retired pollutants in your 2011 EIS submittals. Retired pollutants codes will remain in all previously developed inventories.**

**DETAILS:**

**Pollutant Codes related emissions from coke ovens (141,142,140)**

We are retiring pollutant codes 141 (benzene soluble organics) and 142 (methylene chloride soluble organics) and bringing back (un-retiring) pollutant code 140 (coke oven emissions). Pollutant code 140 replaces pollutant code 141 and 142.

Pollutant code 140 should only be reported for processes associated with coke batteries such as battery charging; battery lid, offtake, and door leaks; pushing, quenching, and combustion stacks.

The reason for the change is that "coke oven emissions" is the listed HAP in the Clean Air Act for which a specific risk has been established. Coke oven emissions are a complex mixture of inorganic particulate, organic particulate, organic vapors and gases which was characterized by measurements of the benzene soluble organics (BSO) component of particulate matter. Because of the toxicity of benzene, measurements of methylene chloride soluble organic material (MCSO) replaced BSO to characterize coke oven emissions. Due to the toxicity of methylene chloride, other solvents, such as hexane, are also being considered for use in quantifying coke oven emissions. The selection of an appropriate extraction solvent is not expected to significantly influence measurement of extractable organic material used as a surrogate measurement of the coke oven emissions. Since the solvent used for the

measurement method has little influence over the measured emissions and the pollutant coke oven emissions is both the listed HAP and has the established risk index, we choose to use the pollutant code that will not vary over time or between different facilities due to the choice of test method.

More information on the sources of coke oven emissions may be found in AP-42 Chapter 12.2 http://www.epa.gov/ttnchie1/ap42/ch12/final/c12s02_may08.pdf and the
Risk Assessment Document for Coke Oven MACT Residual Risk
http://www.epa.gov/ttn/atw/coke/coke_rra.pdf.

**Extractable Organic Matter (EOM)**

We are un-retiring pollutant code 284, Extractable Organic Matter (EOM). Emissions from a variety of source categories have used measurements of BSO, MCSO and other solvent extraction methods to characterize complex emissions. As with coke oven emissions, the solvent selection is not as important as the characteristics of the emissions from the specific source category. EPA has developed several rules (including primary and secondary aluminum) for which this pollutant will be required to be reported in compliance testing and these compliance data will be used to develop emission factors. EOM is typically measured using EPA Method 315 and is one component of EPA Method 202. It is conservatively considered an indicator of polycyclic organic matter, which is a listed hazardous air pollutant. EOM should not be reported with polycyclic aromatic hydrocarbons (PAH) for the same process, as it could be considered as double counting. EOM should NOT be reported for processes associated with coke batteries such as battery charging; battery lid, offtake and door leaks; pushing, quenching, and combustion stacks, as pollutant code 140 (coke oven emissions) should be used for these.

**Dioxin/Furans**

We are retiring dioxins/furans grouped using outdated or unspecified toxic equivalency factors (TEQs) and adding a code representing the latest methodology that had been adopted by EPA for the Toxics Release Inventory reporting. The retired codes are:
600: DIOXINS/FURANS as 2,3,7,8-TCDD TEQs - UNSPECIFIED METHOD
626: Dioxins/Furans as 2,3,7,8-TCDD TEQs - I/89
627: 2,3,7,8-TCDD TEQs - WHO/98
Reporters should either report the individual dioxin congeners or sum them using the WHO-2005 methodology and report the group code 628: Dioxins/Furans as 2,3,7,8-TCDD TEQs - WHO2005

Rationale: For dioxins/furans, the Emission Inventory System accepts pollutant codes representing the individual congeners or dioxin/furan groups reported based on a toxics equivalency. We are retiring codes 600, 626 and 627 because they use toxics equivalency factors based on an outdated TEQ methodology. The current TEQ methodology that other parts of EPA (Toxics Release Inventory program) have been requiring is based on the World Heath Organization (WHO)-2005 (http://www.epa.gov/fedrgstr/EPA-TRI/2007/May/Day-10/tri9015.htm see paragraph III C for changes from WHO/98). Differences in TEQ factors across the schemes can also be seen in the attached excel file.


dioxin teq.xlsx

Note that the retired codes were reported in 2008 by ME (Reg 1), WV (Reg 3), FL(Reg 4), SC(Reg 4), TN(Reg 4), KY(Reg 4), NC (Reg 4), AR (Reg 6), CA&HI (Reg 9). The 2008 emission reported with the retired codes would not need to be modified; however, emissions

submitted with these retired codes will not be able to be submitted for the 2011 (or later) reporting cycles.

Here are the contents of the dioxin excel file:

| POLLUTANT CODE | POLLUTANT_CODE_DESC | HAP_CATEGORY_NAME | ACTIVE | COMMENT | NATO_TEQ | 1998_WHO_TEQ | 1989_I_TEQ | 2005 WHO_TEQ |
|---|---|---|---|---|---|---|---|---|
| 1746016 | 2,3,7,8-Tetrachlorodibenzo-p-Dioxin | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 1 | 1 | 1 | 1 |
| 19408743 | 1,2,3,7,8,9-Hexachlorodibenzo-p-Dioxin | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |
| 3268879 | Octachlorodibenzo-p-Dioxin | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.001 | 0.0001 | 0.001 | 0.0003 |
| 35822469 | 1,2,3,4,6,7,8-Heptachlorodibenzo-p-Dioxin | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.01 | 0.01 | 0.01 |
| 39001020 | Octachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.001 | 0.0001 | 0.001 | 0.0003 |
| 39227286 | 1,2,3,4,7,8-Hexachlorodibenzo-p-Dioxin | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |
| 40321764 | 1,2,3,7,8-Pentachlorodibenzo-p-Dioxin | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.5 | 1 | 0.5 | 1 |
| 51207319 | 2,3,7,8-Tetrachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |
| 55673897 | 1,2,3,4,7,8,9-Heptachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.01 | 0.01 | 0.01 | 0.01 |
| 57117314 | 2,3,4,7,8-Pentachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.5 | 0.5 | 0.5 | 0.3 |
| 57117416 | 1,2,3,7,8-Pentachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.05 | 0.05 | 0.05 | 0.03 |
| 57117449 | 1,2,3,6,7,8-Hexachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |
| 57653857 | 1,2,3,6,7,8-Hexachlorodibenzo-p-Dioxin | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |
| 600 | 2,3,7,8-TCDD TEQ | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 1 | 1 | 1 | 1 |
| 60851345 | 2,3,4,6,7,8-Hexachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |
| 626 | Dioxins/Furans as 2,3,7,8-TCDD TEQs -I/89 | Dioxins/Furans as 2,3,7,8-TCDD TEQs - I/89 | Not in 2011 | pollutant code added for Texas nonpoint data | | | 1 | |
| 627 | Dioxins/Furans as 2,3,7,8-TCDD TEQs - WHO/98 | Dioxins/Furans as 2,3,7,8-TCDD TEQs - WHO/98 | Not in 2011 | pollutant code added for Texas nonpoint data | | 1 | | |
| 67562394 | 1,2,3,4,6,7,8-Heptachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.01 | 0.01 | 0.01 | 0.01 |
| 70648269 | 1,2,3,4,7,8-Hexachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |
| 72918219 | 1,2,3,7,8,9-Hexachlorodibenzofuran | Dioxins/Furans as 2,3,7,8-TCDD TEQs | Y | | 0.1 | 0.1 | 0.1 | 0.1 |